UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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ATLANTA, GEORGIA 30303-8960

4WD-RPB

JAN 20 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams
Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

SUBJ: Conditional Approval of Corrective Measures Study Workplan
Grenada Manufacturing Facility
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

Thank you for your revisions to the Corrective Measures Study (CMS) Workplan dated October 9, 2002. The Environmental Protection Agency (EPA) has reviewed your CMS Workplan which addressed site-wide groundwater corrective action including AOCs A and B which had previously been addressed in the Interim Measures Workplan. While the CMS Workplan contained several excellent proposals for development of longer term corrective measures, it fell somewhat short in the area of source control corrective measures that could be implemented in the near term to obtain immediate environmental protection in the vicinity of AOCs A and B.

Grenada has informed EPA that NAPL recovery is taking place at AOCs A and B from wells located near the eastern outside wall of the manufacturing building. In addition, MW-2 located near the sludge lagoon has been added to the NAPL recovery program. NAPL recovery has been performed since 1993 at AOCs A and B [MW-25 and MW-24 respectively]. It has become apparent to EPA that the existing NAPL recovery efforts are relatively ineffective as interim corrective measures.

The area around AOCs A and B has remained contaminated with extremely high levels of Toluene, Trichlorethene, Vinyl Chloride, and cis 1-2 Dichloroethene. Recent analysis of purge water from Monitoring Well 24 (AOC B) resulted in levels of Toluene; 140,000 ug/l [MCL=1000 ug/l] Trichlorethene; 9,750 ug/l [MCL=5 ug/l] Vinyl Chloride; 3,180ug/l [MCL= 2ug/l] and cis 1-2 Dichloroethene; 19,300 ug/l [MCL=7ug/l].

In the past, the facility has undertaken measures to contain and confine the plumes of TCE and toluene including source removal in the area near MW-24 and MW-25, more recently near MW-2, including closure of the former Equalization Lagoon. The effectiveness of the source

removal at MW-24 and MW-25 has tapered off in recent years. Two years ago, rather than put forth another proposal for TCE and toluene source control the facility proposed a technical remedy composed of a down gradient reactive permeable barrier; coupled with a source or upgradient synergistic reduction technology. The placement of the reactive permeable barrier has been delayed by the necessity to obtain the necessary wetlands approvals from the Army Corps of Engineers. To date, no effective up gradient controls have been either proposed or implemented as interim measures or corrective measures by the facility with respect to the TCE and toluene plumes. *The rapid rate of groundwater movement at the facility [approximately 0.75' per day] makes these lack of controls a major concern to EPA.*

Another important issue is the present and future monitoring for metals, chlorinated, and volatile organic constituents in or near Riverdale Creek. The facility will need to propose an adequate number of surface water sampling stations in Riverdale Creek, as well as groundwater monitoring wells west of Riverdale Creek or near Riverdale Creek. EPA believes that the current monitoring network is inadequate to detect the spread of the plume offsite.

EPA is therefore requiring the facility to immediately propose and implement effective up gradient source control measures for the toluene and TCE plumes in the area of AOCs A and B and MW-2. Source control is a condition of both the approved Interim Measures Workplan and the conditionally approved Corrective Measures Workplan. These workplans are part of the facility's HSWA permit. The facility has a duty to comply per condition I.D.1 of the facility's HSWA Permit dated July 31, 1998.

I.D.1. Duty to Comply. The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.

EPA is concerned that the potential for offsite release of TCE and/or toluene into Riverdale Creek may constitute an imminent and substantial endangerment to human health and/or the environment. Likewise, EPA is concerned that releases to the indoor air may constitute a threat to human health. The latter is being investigated under the facility's Indoor Air Vapor Assessment Workplan. However, offsite releases of hazardous constituents are not being investigated in any significant manner by the facility. EPA is hereby imposing the requirement to conduct and submit Confirmatory Sampling for offsite releases at the Grenada Manufacturing Facility per condition II.D. of the facility's permit dated July 31, 1998. The Confirmatory Sampling will continue indefinitely and become part of the facility's ongoing monitoring for the effectiveness of corrective measures. The facility has forty-five (45) day from the date of this letter to submit a Confirmatory Sampling Workplan.

With regard to the facility's comments in Section 3.2 on proposed Target Media Cleanup Standards; EPA does not anticipate approving Alternative Cleanup Standards for groundwater where MCLs exist. The Point of Compliance for groundwater MCLs will either be at the facility

boundary or the unit boundary, whichever is appropriate. The facility may propose the appropriate boundary for the various waste management areas or combinations of areas. See Handbook of Groundwater Protection and Cleanup Policies for RCRA Corrective Action, September 2002. Short term cleanup goals are designed to meet environmental indicators. Final cleanup goals are designed to achieve media cleanup objectives such as MCLs. The facility must propose a list of SWMUs including groundwater under the entire facility, their appropriate boundaries, and the media cleanup objective for each area. Then the facility can discuss in its CMS Report, how the final cleanup goals will be met in terms of actions to be taken.

The CMS Workplan dated October 9, 2002, is conditionally approved, with the three conditions noted above, regarding source control measures at AOCs A and B and MW-2, target media cleanup standards, and surface water and groundwater monitoring in or near Riverdale Creek. The facility's CMS Study Report will be due one hundred eighty (180) days after receipt of this letter. However, as stated above, immediate, effective source control measures are required at MW-2 and AOCs A and B.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 562-8469.

Sincerely,

N. M. Kumar

Narindar M. Kumar, Chief
RCRA Programs Branch

cc: Louis Crawford, MDEQ
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